

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

PAUL J. McNALLY, as he is TRUSTEE,  
MASSACHUSETTS LABORERS' HEALTH AND  
WELFARE FUND and NEW ENGLAND LABORERS'  
TRAINING TRUST FUND; JAMES MERLONI, JR.,  
as he is TRUSTEE, MASSACHUSETTS LABORERS'  
PENSION FUND and MASSACHUSETTS LEGAL  
SERVICES FUND; MARTIN F. WALSH, as he is  
TRUSTEE, MASSACHUSETTS LABORERS'  
ANNUITY FUND,

Plaintiffs

vs.

G. CONWAY, INC.,

Defendant

and

BOWDOIN CONSTRUCTION CORP.,

Reach-and-Apply Defendant

and

FLEET,

Trustee

C.A. No. 05-10072 MEL

**VERIFIED REQUEST TO ENTER DEFAULT**

Plaintiffs Paul J. McNally, as he is Trustee, Massachusetts Laborers' Health and Welfare Fund, et al, request the Clerk to enter the default of G. Conway, Inc. (hereinafter "G. Conway"). This request is made pursuant to Rule 55(a), Fed.R.Civ.P. In support of this request, the Plaintiffs say:

- 1) This action was filed on February 2, 2005.
- 2) The Complaint was served on defendant G. Conway on March 30, 2005.

3) G. Conway has never filed an Answer or a responsive pleading to the Complaint.

WHEREFORE, Plaintiffs seek the entry of Default in this matter.

Respectfully submitted,

PAUL J. MCNALLY, as he is  
TRUSTEE, MASSACHUSETTS  
LABORERS' HEALTH AND WELFARE  
FUND, et al,

By their attorneys,

/s/ Gregory A. Geiman  
Anne R. Sills, Esquire  
BBO #546576  
Gregory A. Geiman, Esquire  
BBO #655207  
Segal, Roitman & Coleman  
11 Beacon Street  
Suite #500  
Boston, MA 02108  
(617) 742-0208

Dated: December 1, 2005

### **VERIFICATION**

I, Gregory A. Geiman, verify that I have read this Verified Request to Enter Default and that the facts set out in the Request are true to the best of my knowledge and belief.

/s/ Gregory A. Geiman  
Gregory A. Geiman, Esquire

### **CERTIFICATE OF SERVICE**

This is to certify that a copy of the above Verified Request to Enter Default has been served by first class mail upon Defendant G. Conway, Inc. by its attorney, Steven B. Rosenthal at 15 Broad Street, Boston, MA 02109 this 1<sup>st</sup> day of December, 2005.

/s/ Gregory A. Geiman  
Gregory A. Geiman, Esquire